

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

Allan Sanders, <div style="text-align: right;">Plaintiff,</div> v. Union Pacific Railroad Co., <div style="text-align: right;">Defendant.</div>	No. 4:20-cv-03023-JFB-SMB PLAINTIFF’S PROPOSED VOIR DIRE
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Allan Sanders proposes the jury be asked the following voir dire questions, with appropriate follow-up inquiry:

A. GENERAL BACKGROUND

1. Where were you raised?
2. What is your education level? Do any of you hold advanced degrees?
3. Do any of you have experience in politics, as a candidate or working on a campaign?
4. Do any of you have bumper stickers on your cars? If so, what do they say?
5. Are you or any members of your family present or past members of the armed services?
6. What organizations are you a member of?
7. Do you volunteer in any organizations?

B. EMPLOYMENT HISTORY

1. What is your current employment?
2. What is your past employment?
3. Have you ever worked in a job doing physical labor?
4. Do you have any legal training?
5. Do you have any family members with legal training?

6. Are you or a member of your family members of a labor union?
7. Do any of you have experience running a business or holding a leadership or management position?
8. Have any of you been fired from a job or employment?
9. Do you or anyone close to you have a medical or science background?
10. Have you or anyone close to you ever had to review other individuals' medical examination results or records as part of your employment?

C. SOCIAL MEDIA CHOICES

1. What are your primary sources of news?
2. On what social media platforms do you participate frequently?
3. Do you have a favorite book? If so, what is it?
4. What is your favorite TV show?

D. PREVIOUS LAWSUIT OF JUROR SERVICE

1. Have you ever served on jury?
2. If so, what type of case was it?
3. Was it a good or bad experience? Why?
4. Were you a foreperson?
5. Will you be able to put aside past jury experience?
6. What do you think are the most important qualities that a juror should have?
7. Do any of you have experience with the Equal Employment Opportunity Commission?
8. Do you have any feelings about lawsuits that seek monetary compensation for discrimination?

E. EXPERIENCE WITH THE PARITES

1. Do you have any feelings about Union Pacific or railroads in general?

2. Do you have any friends or family members who work there?
3. Have you or has anyone you know applied for a job at Union Pacific or any other railroad?
4. What do you think about employees who sue their employers?
5. Do you have any feelings about lawsuits that seek monetary compensation for discrimination?

F. VIEWS CONCERNING DISABILITY DISCRIMINATION IN CORPORATE AMERICA

1. Do you believe that employers do not take employee disability discrimination complaints seriously?
2. Do you believe that employers are more likely than not to engage in disability discrimination?
3. Have you or anyone close to you ever asked for an accommodation from their employer because of a disability?

G. KNOWLEDGE DISCRIMINATION TOWARDS FAMILY OR FRIENDS

1. Have you ever suffered discrimination of any kind?
2. Has a family member or friend ever suffered discrimination of any kind?
3. What happened to them?
4. Have you ever felt discriminated against in the workplace?
5. Do you work closely with any disabled people?
6. Do you have any feeling or opinion about disability discrimination in corporate America that you feel you want to share?

H. VIEWS CONCERNING COVID-19

1. Would you blame either party for having to attend a trial during the COVID-19 pandemic?
2. Do you have any opposition to wearing a face mask during trial?

3. Do you have any opposition to wearing a face mask at any time?
4. Would you feel pressure to reach a verdict quickly to avoid exposure to COVID-19?
5. Would you be distracted during the evidence by a fear of contracting COVID-19?

February 8, 2022

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